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September 30, 2003

Fairfax VA

Food Guide Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria VA 22302

Dear Food Guide Reassessment Team,

We are a group of Registered Dietitians who meet quarterly to review a variety of pertinent nutrition topics. Our most recent topic review was the Food Guide Pyramid. As a group we formulated feedback for your review for revising the Food Guide Pyramid.

Our comments are as follows:

1. The revised pyramid should be very clear in stating it is for the average healthy American. People with diseases or medical conditions need to consult a professional, as pyramid recommendation may be counterproductive to their condition.

We recommend that consideration be made to having sub-specialty pyramids developed by various governmental agencies. For example- National Institutes of Health could assign various programs under them to develop a Heart Healthy Pyramid, Weight Management Pyramid, Cancer Prevention Pyramid, etc....

2. The 2005 Dietary Guidelines should correspond with the 2005 Food Guide Pyramid. Every revision thereafter should be together.
3. The Food Guide Pyramid and the Food Label need to compliment each other using the same serving sizes and terminology. Currently many people find the food labels very confusing and don't know how to personalize the information.

Food Label Information should include how many pyramid servings a serving of that product contains.

The Food Label should be revised every 5 years along with the Dietary Guidelines and the Food Guide Pyramid.

4. Serving size information needs to be emphasized and very clear. There is much confusion about serving size verses portions that are actually consumed.

Additional information to help people gauge their serving sizes would be helpful such as: Three ounces of cooked meat, fish or poultry is the size of a deck of cards; a medium piece of fruit looks like a baseball; one ounce of cheese is the size of four dice, etc...

5. The current pyramid uses the symbols • for Fat (naturally occurring and added) and ▼ for Sugars (added). These symbols are dispersed throughout the pyramid to show that all food groups contain added fat and sugar. This is a completely lost message to average Americans. Even a few registered dietitians had no idea they were there and what they meant.

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6. There needs to be emphasis on whole grain carbohydrate. Differentiation needs to be made between the refined carbohydrate foods and the whole grains. Pictures on the food pyramid should be whole grains.
7. There needs to be more information on the various types of fats (Saturated, Monounsaturated, Polyunsaturated, and Trans Fat). There needs to be clearer recommended amounts for fat and sugar. The terms sparingly and moderation have no clear definition leaving it up to the consumer to define for themselves what that means to them.
8. Consideration should be given to including a fluid/water recommendation.
9. Overall the pyramid should emphasize lowfat choices and lean protein choices.

Thank you for considering our recommendation for the revision of the Food Guide Pyramid.

Respectfully yours,

Susan Baum, RD
Christine Spengler, RD
Diane Silvester, RD
Clara Schneider, RD
Gisela Barnadas, RD
Inova Nutrition Competency Team
Inova Health System

Tibbetts
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home of the magazine:
Just Eat An Apple
the leading raw vegan mag.
www.justeatapple.com

Jim Tibbetts
Living Foods Technology
Scarborough, Maine

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October 4, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear USDA Team:

This is fabulous that you are opening this up to the public. The action that you are taking and reviving the food chain is very important to the general public and fundamental to the health and well being of the public. And I was very please to hear that you are open to others.

Grace and Peace. I'm been a vegetarian since college (1976) and have written scientific books on vegetarianism and fasting and have a raw vegan magazine. I'm presently working on putting together a vegetarian committee with a second grant received from NASA (Maine Space Grant Consortium). The committee is composed of the some of the top vegan, raw vegan experts in the country for: "The Vegetarian and Fasting Committee for NASA". In the future NASA plans to go to Mars, a 2 1/2 to 3 year mission and they should be vegetarian but are undecided yet as how to go. It's a long term project, which will take time but the committee will help.

Today between 12-15% of the U.S. population is vegetarian to some degree and it is growing, especially as people find out that a strict vegetarian diet can help certain degenerative diseases. The scientific research is clearly showing that a vegetarian diet is superior to a meat eating diet, I have shown this in my two books on this topic. The USDA Food Guide Pyramid has several problems the biggest one is that it is not valid for the growing number of vegetarians. There needs to be a separate vegetarian committee to come up with a separate food guide for a new pyramid: "The USDA Vegetarian Food Guide Pyramid".

Of course this USDA team will say, "we can develop a vegetarian food guide pyramid", but how many vegans, or raw vegans are there on your committee? Is your committee aware of all the clinical and scientific research on vegetarianism to construct such a vegan pyramid?

My books and writings are some of the best compilations of scientific research on vegetarianism and vegan and raw vegan research and clinical evidence out. I'm in contact with many of the top people in the vegan, raw vegan field right now, mostly MD's and PhD's in the process of forming a committee on this. I would like to take and form a committee of these experts and gather the scientific evidence to show the USDA team the evidence for a Vegetarian Food Guide Pyramid. We could be an addition to the team already in place.

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of 15-20 experts

This committee that I will help form: "USDA Vegan Food Guide Pyramid Team" will work in conjunction with the present Food Guide Pyramid Reassessment Team and submit our findings and evidence to them. We would be honored to work with the present USDA team.

A survey by the U.S. Dept. of Agriculture and a study in the American Journal of Clinical Nutrition shows that the vegans are the most efficient in terms of nutrition because they can consume less and get enough nutrients at the same time. They are eating more fruits and vegetables with almost double the fiber of the lactovegetarians. And their average protein intake is 35 grams, the average American is usually over 100 grams.

	<u>Meat-eaters</u>	<u>Lactovegetarians</u>	<u>Vegans</u>
protein	85 g	55 g	35 g
fiber	4.5 g	8 g	15 g
salt	2.5 g	1.2 g	0.25 g
calories	2000 cal	1800 cal	1600 cal

Studies by the NIH's original studies found the average 150 lb. male only needed 36 grams, independent studies found 35 grams, overseas studies found only 30 grams were needed (they did not use nitrogen balance methods which are problematic and said not to be as accurate). The studies of the Hunza's the world's longest lived and healthiest people show they only need about 30 grams of protein. Thus somewhere between 30 to 35 grams is actually needed.

After coming up with 36 grams the NIH said perhaps we should build in a safety factor so they bumped it up to 44 grams as the official amount. Then after more studies and talks (with meat promoters and others) it was bumped up to 54 grams or is it 64 grams? We know now that excess protein is damaging to the kidneys, and causes kidney stones and gallstones.

Studies have shown that when you cook meat or any protein source you can destroy or denature 50% or more of the amino acids for proteins. Thus one study showed cooking two eggs ends up with only half the amount of protein. Thus cooking is a factor not taken into account. Cooking foods destroys all the water soluble B-vitamins and other nutrients. Thus the Raw movement or Living Foods is coming into a solid scientific foundation. All enzymes are destroyed when cooking above 118 degrees, which everyone does. The more foods that a person can eat raw generally the more nutrition can be assimilated. About 80% of the foods we eat on a vegetarian diet should be raw, living foods, thus the term 80/20, or 80% raw and 20% cooked is a standard in the raw vegan movement, though some choose to go 100% raw.

Vegetarians and lacto-vegetarians and others in this area are really in transition to becoming a vegan or raw vegan. Thus there are only two pyramid's: The Animal Based Food Pyramid guide and the Vegetarian Based Food Pyramid guide. These two Pyramids have totally different nutrient requirements in terms of proteins, calories and other nutrients, as shown in brief above and vegans process food better because they are less toxic and healthier. Two different pyramids are needed for the general public: one meat and one vegetarian.

A second main reason why a Vegetarian Pyramid is needed is because the scientific evidence and even the American Dietetic Association is concluding that a vegetarian diet is

healthier than a meat based diet. One major study has shown that mortality rates for the average vegan has 77% less than the average person on the Standard American Diet and the average lacto-vegetarian person has 57% less. Many studies can show similar patterns of health. Thus it is a question of whether the USDA and the NIH wants to promote the healthiest diet for Americans or not? If you do then you need to promote a vegetarian diet along side a meat based diet, in nutritional status and in the food pyramid guide!

By this time your probably wondering about all this scientific evidence. I'm printing a summary of the evidence from one of my books on some of these topics. My more complete much bigger book with the research in more detail has more studies than this condensed version.

When the original Food Pyramid Guide came out they put a million dollars into the research and it was by professionals who are not vegetarian and based it on a meat based diet. On top of that it was politically motivated. The committee came to the conclusion that cows milk was not a healthy food source which numerous studies have shown and so they place it on the very top of the food pyramid guide. The milk industry objected and went to congress and stopped the original Pyramid Guide which was already printed from being released. Congress forced the USDA to put milk with it's own category, fearing losing sales. The section — Milk is for Cows is to address this issue. The USDA should put milk back at the top of the pyramid. I can provide much more scientific evidence to show this too.

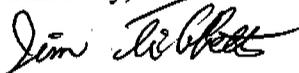
This is a third reason why allowing me to form a, USDA Vegetarian Committee of Vegan Experts would benefit the present USDA team because our research will clearly show the USDA team why changes are needed in their present food guide pyramid, and also it will give a totally new Vegetarian Food Guide Pyramid, produced by a group of Vegan Experts, which will make it more scientifically accurate and more acceptable to the knowledgeable health food public. For example, B-12 is destroyed in cooking and even in vegetarians eating a cook foods but not in raw vegans since it is created in the gut! It is little things like this that a lot of nutritional experts don't know and the reason for a group of experts who are already vegan, raw vegans to be in charge of this committee, meat eaters do not have the experience nor the knowledge of this field.

Please contact me about forming a USDA Vegetarian Committee to help your team come up with a set of nutritional standards for vegetarians, vegans and raw vegans and also to create a Vegetarian Food Guide Pyramid for the general public.

I look forward to working with you and your team with my associates. And again I think that this is great the you have opened this up to the public to get our comments and constructive criticism. Enclosed is some material with research and footnotes for your interest.

Hope to hear from you, thanks for any help and God bless.

Sincerely,



Jim Tibbetts

Paulson 1 of 2

September 29, 2003

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

Dear Food Guide Pyramid Reassessment Team,

In my opinion, the current food guide pyramid has contributed to an overwhelmingly large number of obese Americans, currently estimated at 1 out of 3 people in the USA, and growing. The predominant reason for this medical issue, in my opinion, is two-fold:

- 1) An overemphasis on highly starchy foods such breads, cereals, rice, and pastas at a whopping 6-11 servings per day. In a largely sedentary population such as the USA, a great percentage of this is converted and stored in the body as fat, leading to obesity.
- 2) No specific distinction is made in whole-grain versus white bread, whole grain pasta versus egg-based pasta, etc. Whole-grain breads and pastas, as well as nuts and seeds are far healthier and should be elevated to a higher serving size on any future pyramid.

While the current 6-11 serving level of starches may be adequate for a well-trained athlete who burns thousands of calories per day, it is wholly overkill for the average sedentary American. I would recommend that 2 (possibly 3) pyramids be developed, based on the lifestyle, frequency of exercise, and age of the highly diverse American population.

The first pyramid would still have the bread and pasta-type starches as the initial layer. However, we should ensure that the current bread, grains, and starch servings be reduced from 6-11 to 4-9 servings, and then only for the highly athletic audience. This first layer itself should be shared with green and yellow vegetables, steamed or raw. This should be increased from 3-5 to 5-7. Nuts, seeds, and whole-grain breads/pastas can all be lumped together as a far better nutritional source than ordinary plain white flour. Also, I would strongly reduce the milk, cheese, and yogurt servings from 2-3 to 1-3, with an emphasis on eating more plain yogurt to encourage the consumption of friendly (lactobacillus) bacteria, while reducing the cheese (excessive fat) servings to 1 per day. In the starch category, I would emphasize whole-grain breads, brown rice, and whole-grain pasta, as opposed to white flour, which is probably responsible for more nutrition problems in the country than we could possibly imagine.

A second pyramid should be developed for the more sedentary population, essentially the non-athletic population in general. These people rarely exercise and need far fewer starches in their diet. I would move to more green and yellow vegetable servings (8-10) as the first (lower) layer. I would then place meat, poultry, and fish layer as the next (2nd) layer at the current 2-3. I would then move the starch layer (3rd) to 1-3 servings per day, down significantly from the current 6-11. The milk and yogurt layer should also be reduced to 1-3 servings, with an emphasis on yogurt and less on cheese.

A possible third pyramid should be developed for the ever-burgeoning senior population in the USA. The senior (50+) age group should have a diet composed heavily of green and yellow steamed vegetables, 6-9 servings. I would have only 1-3 servings of starches, all whole-grain of

Paulson 2002

course. The dairy group I would also reduce to 1-2 per day, with again a heavy emphasis on yogurt (preferably goat or skim milk). Fruits should be increased to 3-4 for this population.

For all three pyramid groups, the substitution of oils such as macadamia nut and olive in lieu of butter would go a long ways toward reducing the level of saturated fats in these diets. I would mandate that no trans-fatty acids be used as well as prohibit the use of hydrogenation in any oils sold on the market. All oils used should have the words "omegaflow process" on a label, meaning that the oil has been protected from reaching high temperatures during processing. Consumption of oils such as olive and macadamia nut should be encouraged to assist in proper digestion and better absorption of calcium and other minerals. These can be placed on the same level as milk and other dairy food items.

Fruits, in general, should be on par with the milk and dairy group. I put the servings at 3-4, with an emphasis on highly alkaline fruits such as strawberries, pears, and watermelon. These three fruits have higher pH levels that can reduce the overall acidity of the human body by virtue of their highly alkaline content. ~~It is the highly acidic (low pH) foods that Americans are consuming that are directly related to obesity and cancer health issues in this country.~~

Sweets on the pyramid should be strongly discouraged, especially those made with processed sugar cane (ordinary table sugar/pure glucose). Specialty sweets containing molasses and honey could be placed ahead of ordinary table sugar which itself is contributing to overwhelming obesity issues in the USA. The sweets category should register at the top of the pyramid as a speck, barely noticeable. This category has no significant nutritional value whatsoever. Both molasses and honey have nutritive properties, which are far better than ordinary table sugar.

I believe that the 2 or 3 pyramid approach, based on lifestyle, age, and other factors is a better approach toward reducing obesity in this country, as well as type II diabetes, a closely related medical condition. Type II diabetes is hitting record numbers of Americans, including children. This can easily be remedied by advocating huge quantities of steamed green and yellow vegetables, fruits, and whole-grains (including seeds, nuts, and legumes).

It is my fervent hope that the USDA will consider the aforementioned advantages of a more vegetable and fruit diet for the health and well-being of all Americans. Please give us a sound and safe pyramid (even 2 perhaps) that emphasizes the value of live foods over anything else.

Thank you for your interest in my letter.

Best regards,



Frank L. Paulson, Nutritional Consultant

Carrollton, Texas

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Our mission is to encourage and promote a more advanced knowledge and use of nutrition in the practice of chiropractic for the maintenance of healthy and the prevention of disease.

2 October 2003

USDA Center for Nutrition Policy & Promotions
3101 Park Center Drive—Room 103A
Alexandria, VA 22302

To Whom It May Concern:

First let me congratulate you on considering a new Food Pyramid.

Four years ago the American Chiropractic Association asked our council to endorse the USDA Food Pyramid. We voted overwhelmingly "NO" due to its inherent flaws. The result of the ensuing discussion was to establish a committee to create an alternative "food pyramid."

I am enclosing our alternative to the Food Pyramid called **Building Blocks For Healthy Eating**, along with an explanatory article. Our version is geared as a handout for patients.

We printed 8 1/2 X 11 and 2' X 3' poster sized versions that are available for purchase through Council Headquarters.

I hope you will consider our recommendations in your new version. If you have any questions please contact me.

Sincerely,

William J. Rice, DC, DACBN, CCN, FACCN

Visit our Website: www.councilonnutrition.com

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Back To Our Ancestor's Diet- A Healthy Move

William J. Rice, DC, DACBN, CCN, FACCN

According to S. Boyd Eaton, M.D., one of the foremost authorities on paleolithic (prehistoric) diets, modern diets are out of sync with our genetic requirements. He makes the point that the less you eat like your ancestors, the more susceptible you'll be to coronary heart disease, cancer, diabetes, and many other "diseases of civilization."³

Also, according to Eaton, 99 percent of our genetic heritage dates from before our biological ancestors evolved into Homo sapiens about 40,000 years ago, and 99.99 percent of our genes were formed before the development of agriculture about 10,000 years ago.

Before the advent of agriculture, all people were hunter-gatherers: they gathered various fruits and vegetables to eat and they hunted animals for their meat. Of necessity, the ratio of meat and fruits/vegetables varied with geographic location, climate and season. Until these hunter-gatherers began to cultivate grains and livestock, they rarely drank milk beyond infancy or ate grains.¹

With the spread of agriculture, the nomadic groups became more stable larger societies in order to tend the fields. Culture and knowledge became more commonplace and flourished. People also began to consume large amounts of grains, milk and domesticated meat. They also became more sedentary.¹

With the advent of the industrial revolution, even more dramatic changes were forthcoming. Beginning around 1900, whole grains were routinely refined, removing much of their nutrition, and refined sugar started to become commonplace. In 1939, nutritionist Jean Bogert noted, "The machine age has had the effect of forcing upon the peoples of the industrial nations (especially the United States) the most gigantic human feeding experiment ever attempted."⁴ Over the past 40 years, the average diet has changed even more dramatically than Bogert could have imagined, due primarily to the growth of fast-food restaurants.

According to Eaton, the many dietary changes over the past 10,000 years have outpaced our ability to genetically adapt to them.⁵ To put this into another perspective, 100,000 generations of people were hunter-gatherers, 500 generations have depended on agriculture, 10 generations have lived since the start of the industrial age, and only two generations have grown up with highly processed fast foods. "The problem is that our genes don't know it," Eaton points out. "They are programming us today in much the same way they have been programming humans for at least 40,000 years. Genetically, our bodies now are virtually the same as they were then."⁶

Today's plethora of diets - from fast-food burgers to various concepts of balanced diets and food groups - bear little resemblance, superficially or in actual nutritional constituents, to the diet H. sapiens and its ancestors consumed over millions of years. For example, vitamin intake is lower today and the dietary fatty acid profile is substantially different from our evolutionary diet. Our diet today fails to provide the biochemical and molecular requirements of H. sapiens.¹

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In 1992, the U.S. Department of Agriculture published the Food Pyramid (DAFP), which, unfortunately was tainted by the sponsors, such as the dairy and cattle industries. In 1997, The American Chiropractic Association asked the Council on Nutrition (CON) if they would endorse the standard 1992 USDA Food Pyramid. A rather lengthy, heated discussion on the topic followed, but the overwhelming feeling was "absolutely not." The President of the CON created a committee from the membership of the CON to formulate a new "pyramid" with Dr. William J. Rice as the chairman. This was the conception of the Building Blocks for Healthy Eating (BBHE).

Over the next year, Dr. Rice communicated via fax and e-mail with the fifteen or so people who volunteered to be on the committee. We used the pyramid as a guide, but quickly decided what the flaws were in the pyramid design and concept. We researched the recommendations from many sources. This was not a simple task as there are a number of our fellow practitioners who are vehemently opposed to certain foods in the diet, such as dairy products. We tempered all radical ideas with the concept that this program was for everyone and needed to reflect moderation.

Therefore, dairy products are included, but we recommend organic, natural products free of pesticides, herbicides and hormones. In addition, we recognize that a great number of people are either allergic and/or sensitive to dairy products or do not have the necessary enzyme (lactase) to digest dairy products. So we added a caveat about that. We also made it clear that this document was intended as a generalized chart and that people should check with their health care practitioner for specific recommendations.

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One of the most important differences between the BBHE and the 1992 DAFP is that the BBHE chart lists the most important foods first on top - where they belong - not at the base of some arbitrary geometric shape. We also considered water to be the most important nutrient as our bodies are almost 70% water. ¹³

Another important difference is that our group was not influenced by any outside organization or industry. We were only concerned with what foods are best for the general public. We were not concerned with offending the cattle or dairy industry, etc.

One major criticism of our chart was the lack serving sizes. That was done intentionally to give the practitioner the prerogative of making individual plans for their patients. There were adequate references for drinking 6-8 glasses of water daily, so that remained. Another problem we encountered was where to put certain foods such as beans and legumes that are vegetables, but also quite high in protein. We compromised by including them in both categories.

The BBHE is a model for a balanced diet. It moved away from the very high carbohydrate diets, yet is careful to not be classified as a high protein diet. It is much closer to the Zone diet (40-30-30) with an emphasis away from the fats and processed foods.²⁶ This dietary approach will help to keep the blood glucose and insulin levels balanced, and is therefore, anti-inflammatory in nature.

There are many foods listed on the BBHE chart that may be strange to many people. The idea is to give people a wide variety of foods to choose from which will help reduce the risk of developing food allergies and provides a variety of nutrients unavailable in monotonous diet. Whole grains such as kamut, millet, kasha, spelt, and amaranth for example, are all readily available in every health food store and many supermarkets across the country.

Our goal is to replace the 1992 Department of Agriculture Food Pyramid with the Building Blocks for Healthy Eating in every nutritional-oriented source in the world. We would like to distribute these charts and posters to the schools and practitioners and make them aware of the means of healthier eating. These charts are available in 8 ½ x 11-inch pads of 50 and 16 x 20-inch posters through the ACA Council on Nutrition. We will send one free to any educational institution that requests one.

In the interest of clarity, a comparison chart is provided below.

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**A Comparison Chart of the Building Blocks for Healthy Eating and
The 1992 U.S Dept. of Agriculture Food Pyramid.**

NUTRIENT	BUILDING BLOCKS	FOOD PYRAMID
Water, Purified	6-8 (8 oz.) glasses daily	No recommendations.
Complex Carbohydrates (from vegetables and beans)	Vegetables, tofu, beans & legumes-fresh or frozen; vegetable juices. 4-6 servings daily.	No specific recommendations. Included in complex carbohydrates from starches.
Complex Carbohydrates (from starches)	Bread, cereals & baked goods. Unprocessed whole grains- Whole wheat, barley, oats, brown rice, rye, corn, millet, kasha, spelt, amaranth, kamut, etc. Potatoes with skins, whole grain breads, whole grain breakfast cereals, whole grain pasta, whole grain crackers. Rice cakes, whole grain pretzels, popcorn. 2-3 servings daily-Balanced with Protein.	Breads, cereals, rice and pasta. Includes complex carbohydrates from starch sources. 6-11 servings daily.
Protein	Fish, wild game, poultry, free-range beef and lamb, nuts tofu seeds, eggs, beans & legumes 2-3 servings daily. Milk - skim or 1%, yogurt, kefir, buttermilk, low-fat cheese. (If approved by your health care practitioner. 1-2 servings daily	Meat, poultry, fish, dry beans, eggs & nuts. 2-3 servings daily. Milk yogurt, and cheese 2-3 servings daily.
Fruits	Fresh, frozen, dried or juice 1-3 servings daily.	Fresh fruits, fruit juices, and frozen, canned, or dried fruit. 2-4 servings daily.
Vegetables	Included with complex carbohydrates (from vegetables and beans)	Starchy vegetables, (potatoes, corn, peas) Legumes (navy, pinto, and kidney beans, chickpeas), other vegetables(lettuce, potatoes, onions, green beans.) 3-5 servings daily.
Fats	Avocados, olives, cold-pressed oils (safflower, olive, flax), butter mayonnaise, salad dressings, nuts seeds (avoid saturated fats, margarine, hydrogenated & partially hydrogenated oils and trans-fatty acids.) 1-2 servings daily.	It is recommended that Americans limit fat in their diets to 30 percent of the calories. Use sparingly.
Simple carbohydrates	Sugars, white flour, sweets, cookies, cakes and processed foods Not recommended	Use sparingly

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Upon close comparison, it would appear that the guidelines put forth in the BBHE would certainly bring us closer to the Paleolithic diet which our genes are dictating is of greatest benefit than those put forth by the 1992 DAFP as it currently stands. Perhaps, as a society, we would be better served to adopt the guidelines of the Building Blocks for Healthy Eating in place of those put forth by the 1992 USDA Food Pyramid.

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Allers
1 OF 1

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10/6/09

KT

RE: Public Comments on the Food Pyramid Guide

Thank you for seeking public opinion on the Food Pyramid. As the dietary model behind federal food programs, including the National School Lunch Program, the Pyramid needs to evolve with nutrition science.

When the Dietary Guidelines Advisory Committee convenes to review current policy, I hope they will emphasize the Vegetarian/Vegan Six Food Groups: Whole Grains and Starches, Legumes, Green and Yellow Vegetables, Nuts and Seeds, Fruits, Vitamin and Mineral Foods.

Present guidelines advise two to three daily servings of dairy products along with meat as a main protein source. While this plan successfully promotes the meat and dairy industries, it ignores numerous studies linking saturated fat and cholesterol in meat, eggs, and dairy products with heart disease, cancer and stroke—the top three killers in the U.S.

Dairy products alone are associated with obesity, high blood pressure, juvenile onset diabetes, prostate and breast cancers, allergies, nasal congestion and ear infections, according to the American Heart Association.

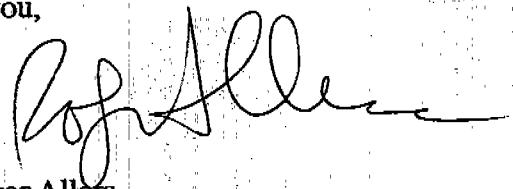
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Children, in particular, deserve alternatives to the fatty fare on school lunch lines. In a 1999 American Heart Association Scientific Sessions report, one in six teenagers' hearts showed significant blockage and the arteries of five-year-olds were clogged with fatty patches. Veggie burgers, soy cold cuts and soy milks are great substitutes for corn dogs, pizzas and milkshakes.

The FDA links contaminated meat goods with six and a half million cases of food poisoning and six thousand deaths every year. Animal-based meals contain residues of growth-inducing hormones and antibiotics. In fact, antibiotic abuse on factory farms has led to what the scientific community labels Super-Bugs-Bacteria. SBB are resistant to current antibiotic therapies.

The Vegetarian/Vegan Six include all the essential carbohydrates, fats, protein, vitamins, minerals and water necessary for a balanced and healthy diet. They also prevent disease and obesity. Please revise the Food Guide Pyramid to reflect vegetarian sources of protein, calcium and other vital nutrients.

Thank you,



Mr. Roger Allers

Santa Monica, CA

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Hackenson

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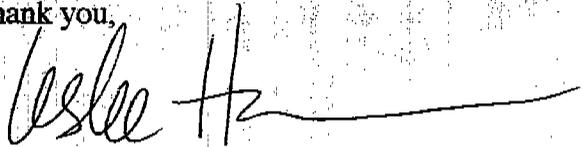
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Thank you,



Mrs. Leslee Hackenson

Santa Monica, CA

September 26, 2003

Food Guide Pyramid Reassessment Team
USDA -- Center for Nutrition Policy
and Promotion
3101 Park Center Drive, 10th Floor
Alexandria, VA 22302

Dear Ms. Davis:

The Vegetarian Resource Group is a nonprofit educational organization that works with individuals, consumer groups, food companies, professional associations, government agencies, academic institutions, and other relevant constituencies to disseminate accurate information and sound advice to the public concerning vegetarian diets.

We appreciate the opportunity to share our ideas about future modifications to the Food Guide Pyramid. We have an interest in this tool being relevant to the broadest range of individuals, including the increasing number of population groups with eating patterns that do not conform to traditional US patterns.

Food consumption patterns are rapidly changing in the US, driven in part by the changing US demographics documented in Census 2000. Increasing racial and ethnic diversity is bringing with it food preferences outside the cultural norm. Tools aimed at assisting the general population in making wise food choices should take into consideration that by 2050, it is anticipated that today's minority populations will be the majority, with food preferences and practices that will vary widely from the standard American diet of years past.

Additionally, research findings emerging over the past decade relating to diet and disease relationships indicate that diets with a higher ratio of plant to animal products than traditionally recommended confer health advantages. This, too, has resulted in growing interest in vegetarian diets and alternatives to meat and dairy products. A recent Harris poll conducted for the Vegetarian Resource Group found that 6 percent of the US population regularly avoids consuming meat. The food industry has identified an even larger number of "meat restrictors," individuals who are actively reducing their dependence on foods of animal origin.

Our comments on the Food Guide Pyramid relate both to substance as well as graphic representation of recommendations:

* The FGP should support adequate intakes of vitamin E. Greater emphasis should be placed on nuts, nut butters, and vegetable oils. This might be accomplished by adding a new food grouping titled "Nuts and Seeds Group."

Havala
1 OF 2

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The



VEGETARIAN
Resource Group

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Havala
2 OF 2

* Currently, all fats are included in the tip of the pyramid as "Fats, Oils, and Sweets." Health-supporting fats from vegetable oils, nuts, and seeds should be in a different category from saturated fats and trans fatty acids.

* The "Breads, Cereals, Rice and Pasta" group should be prefaced by the descriptive term "whole grain" and accompanied by a recommendation that at least 50 percent of choices should be whole grains.

* Dry beans are now included in the "Meat, Poultry, Fish, Dry Beans, Eggs, and Nuts" group. Dry beans contain substantial amounts of dietary fiber and beneficial phytochemicals, substances for which greater consumption is encouraged. They are high in protein but low in total fat and saturated fat. Nuts are rich sources of unsaturated fat. In contrast, meat, poultry, fish, and eggs contain no dietary fiber and contribute saturated fat and cholesterol, substances consumed in excess in the US diet. Reordering the list as "Dry Beans, Nuts, Eggs, Fish, Poultry, and Meat" could help to indicate that dry beans are a more healthful choice than meat.

* Since many consumers use only limited amounts of dairy products, and given that dairy products are not traditionally included in the diets of many ethnic groups, the FGP should emphasize multiple sources of calcium. The list should include dark green vegetables and fortified foods, including soymilk, rice milk, and fruit juices fortified with calcium. While these foods contribute comparable amounts of calcium, plant sources of calcium have the added advantage of being low in saturated fat and devoid of cholesterol as compared with milk and other dairy products, which are the major contributors of excessive intakes of these nutrients in the US diet. Nondairy sources of calcium should be included in the graphic representation of the FGP.

Thank you for considering these remarks.

Sincerely,

Suzanne Havala
Reed Mangels

Suzanne Havala, DrPH, MS, RD
Reed Mangels, PhD, RD
Nutrition Advisors
The Vegetarian Resource Group

CORY
1 OF 1

LINCOLN CORY

ARL. VA. 7

Add to the Food Pyramid:

- 1) Need for fiber in some form
- 2) Level of activity
- 3) Likes and Dislikes (my nephew does not like salad)
- 4) Medical reasons to avoid food- no orange juice
- 5) Age relationship- children and older adults (no teeth)

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10/6/03

KT

D. Lincoln Cory LPN
r@s

Thanks

D. Lincoln Cory

Arcell 1 of 1
Jamini and Robert Arcell
Olathe, Kansas

Food Guide Pyramid Reassessment Team
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Thank you, Jamini & Robert

Spear 10/1

October 2, 2003

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10/10/03
KS

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Sirs or Madam,

Thank you for the opportunity to offer input regarding the Food Guide Pyramid. As you know 64% of the US population is overweight. I believe the Food Guide Pyramid should incorporate a foundation of 30 minutes of physical activity everyday. W.C. Willet (Eat, Drink & Be Healthy, 2001) suggests a food guide pyramid with red meat, butter, white rice, white bread, potatoes, pastas and sweets at the top with daily exercise and weight control at the bottom. The expanding American waistline needs fewer calories and more exercise.

I know the USDA is caught between promoting the meat and dairy industry and guiding Americans to healthier lifestyles via the Food Guide Pyramid. To continue promoting the meat and dairy industry, when the health of so many Americans has been negatively impacted by over consumption of these products, is a disservice to our health. Calcium can be found in sources other than dairy. Many Americans tend to select fatty meats versus lean cuts. . . By placing meat sources first, meat, poultry, and fish, consumers falsely believe meat is the best protein source. More Americans are consuming non-animal based protein sources so more examples of non-meat protein options should be provided.

Many people do not understand a serving size compared to portions provided in restaurants. People are confused by the mixed messages of what constitutes a serving size when comparing the Food Guide Pyramid, nutrition labels on food packages and the servings they receive when eating out. The current pyramid shows a whole chicken, whole loaf of bread, and a large bowl of pasta and people think these represent a serving size. Show specifically what constitutes a serving. I would suggest replacing the triangles and squares depicting fat and sugar with pictures of pastries, candy and pop.

Surgeon General Carmona spoke to the Joint Economic Committee on October 1, 2003. He said the problem of obesity required a multi-faceted approach. Reworking these dietary guidelines is an important step. Use good science to support your work and refuse to be influenced by the food industry. They want us to eat more and not make positive food choices. Help guide Americans in a positive way to healthier lifestyles. We cannot afford to continue losing 300,000 Americans due to obesity at a cost of \$400 per capita each year. We cannot afford to pay for the increasing rates of diabetes in our children and adults. The science has evolved and yet most Americans are health illiterate, they do not understand how to make good choices based on the best science. USDA should be a the forefront of showing people how to eat smart, understand what is healthy and make the best food choices.

Thank you,

Caile E. Spear
Caile E. Spear

Boise, ID